UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

LISA PENNICK,

Plaintiff

v.

Civil Action No: 05-CV-11060WGY

MICHELE GRENNON, GRENNON DESIGN

Defendants

<u>DEFENDANTS MICHELE GRENNON AND GRENNON DESIGN'S ASSENTED-TO</u> <u>MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD</u>

Defendants, Michele Grennon and Grennon Design, with the assent of the plaintiff Lisa Pennick, hereby move for an extension of time to answer, move or otherwise plead in the above-captioned matter from May 27, 2005 to June 1, 2005. As grounds for this motion, defendants state as follows:

- 1. The defendants need additional time to answer or otherwise plead to the Complaint in the above-referenced matter.
- 2. Jacob T. Elberg, counsel for the plaintiff, has assented to this motion, and the motion will not in any way delay the proceedings in this case.
- 3. I hereby certify that I have obtained the consent of Jacob T. Elberg, counsel for the plaintiffs to the relief sought in this motion.

WHEREFORE, the Defendants respectfully request that the Court enter an Order:

A. Granting an extention of time to answer or otherwise plead in this matter from May 27, 2005 to June 1, 2005; and

B. Granting such further relief as may be just, equitable and appropriate.

Respectfully submitted, MICHELE GRENNON AND GRENNON DESIGN By its attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON, PROFESSIONAL ASSOCIATION

Dated: May 25, 2005

By: ____/s/ Eric M. Sommers_

Eric M. Sommers, BBO #649611 900 Elm Street P.O. Box 326 Manchester, NH 03105

Tel: 603-628-1337 Fax: 603-625-5650

eric.sommers@mclane.com

Certificate of Service

Jacob T. Elberg, Esq. Dwyer & Collora, LLP 600 Atlantic Avenue Boston, MA 02210

I hereby certify that on May 25, 2005, I caused to be served on the above-named counsel of record a copy of the forgoing Assented-To Motion For extension Of Time To Answer Or Otherwise Plead via electronic transmission in accordance with the Court's Administrative Procedures for Electronic Case Filing.

<u>/s/ Eric M. Sommers</u>
Eric M. Sommers